

Comments of William J. Deegan, III, K9XT
In response to RM-11306

1. I am generally in favor of the ARRL's Petition for Rulemaking to convert amateur band segmentation from emission type to bandwidth maxima; however I do not fully agree with their proposal for partitioning certain amateur bands into several maximum bandwidth sub-bands.

I believe this amount of segmentation amounts to over-regulation and will be extremely difficult (and perhaps costly) to police.

I also believe this amount of band segmentation is contrary to the experimental nature of amateur radio and will stifle technological growth.

2. I would encourage the Commission to consider band planning in the same manner as published by the Radiocommunications and Broadcasting Regulatory Branch of Industry Canada in their "Standards for the Operation of Radio Stations in the Amateur Radio Service," bulletin RIC-2, Issue 5, July 2005.

In their bulletin, Industry Canada *provides only one specification of bandwidth for an entire frequency band.*

Industry Canada has established a maximum bandwidth of 6 kHz for the entire bands of 160 meters, 80 meters, 40 meters, 20 meters, 17 meters, 15 meters, and 12 meters. They have established a maximum bandwidth of 1 kHz for the 30 meter band, and a maximum bandwidth of 20 kHz for the entire 10 meter band. They also established very broad maximum bandwidths for the 6 meter, 2 meter, 220 MHz, 430 MHz, and 902 MHz bands.

Clearly, by defining bandwidth this broadly, Industry Canada is promoting the experimental nature of amateur radio and they are minimizing formal regulation in favor of self-regulation of the service.

3. I do agree with the 2.8 kHz bandwidth specification for the channels on the 60 meter band, as proposed by the ARRL; however, I would like the commission to consider allowing modulations types other than 2K8J3E USB in this band. Providing maximum bandwidth does not exceed 2.8 kHz, expanding usage of this band to other modulation types (for example, a digital signal) would promote utilization of this band by the amateur service.
4. I encourage the Commission to consider a broad-brushed plan for bandwidth regulation, rather than a tightly defined set of standards, and depend upon the amateur community to self-regulate their bands through mutually developed band plans and traditional operating modes.
5. Finally, I would also encourage the Commission to consider and make reasonable accommodation for special types of wide-bandwidth emissions (such as, but not limited to, DSB AM modulation or Enhanced SSB modulation) within the amateur HF frequency bands, with perhaps as much as a 10 kHz bandwidth specification.

I sincerely appreciate this opportunity to comment on RM-11306.

William J. Deegan, III
11121 East Lakeshore Drive
Carmel, Indiana 46033